



FINE BRASS HARDWARE

**MERIT METAL PRODUCTS CORPORATION**

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**December 26, 2007**

**Ms. Joan Martin-Banks  
U.S. Environmental Protection Agency, Region III  
1650 Arch Street  
Philadelphia, PA 19103-2029**

**RE: Merit Metal Products Corporation – Chem Fab Site,  
Doylestown, Bucks County, Pennsylvania**

**Dear Ms. Martin-Banks:**

**Enclosed please find Merit Metal Products Corporation's ("Merit Metal") response to the 104(E) information request of Laura B. Johnson.**

**For your information, Merit Metal is a manufacturer of fine decorative hardware located in Warrington, Pennsylvania. From prior to 1965 and until 1978, which is a period relevant to this matter, Merit Metal was wholly owned by Mel Silverman, now deceased, who focused the business on marine and government hardware. Leonard Sayles and Leonard Wolberg ("Sayles and Wolberg") purchased a minority interest in Merit Metal from Mel Silverman in 1978 and the remaining majority interest in 1980. Sayles and Wolberg continued to operate the business until the sale of most of Merit Metal's assets to Stefanowicz & Lutz, Inc. on July 15, 1988. Our response therefore only covers the period from July 15, 1988 through 1999.**

**The current Merit Metal was a defendant in the Boarhead Farms Superfund litigation. In that matter, a motion for summary judgment of Merit Metal on the ground that it is a non-liaible successor-in-interest was filed. I have enclosed a copy of that motion and the order granting it (Exhibits A & B). I have also enclosed a copy of the plaintiff's comments on the motion indicating no objections to it (Exhibit C).**

**We are not aware of any connection to the Chem Fab site by the "new" Merit Metal. If our only connection to the site is via Manfred DeRewal and the "old" Merit Metal, then I believe the same facts as described in our motion for summary judgment in the Boarhead Farms case would apply.**


**Ms. Joan Martin-Banks**  
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**Of course, please don't hesitate to contact me should you require any additional information.**

**Very truly yours,**


**Merit Metal Products Corporation**

  
**Adam R. Stefanowicz, Jr.**  
**Executive Vice President**

**/sa**

**Enclosures**

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1. Manufacturer of brass hardware. We can only comment on the period from 7/15/1988 to 1999 and the nature of the business has remained the same. The only change to our operation was to close a small plating department in 1989.
- 2a. 1,1,1-Trichlorethane – stopped using in 1996, replaced with ultrasonic cleaner.  
Vibratory Solids  
Lacquer and Lacquer Thinner  
Vibratory Liquid  
Hydraulic Oil
- 2b. 1,1,1-Trichlorethane – 1996 – four 55 gallon drums  
Vibratory Solids - approximately three to four 55 gallon drums per year  
Lacquer thinner and lacquer – approximately one to two 55 gallon drums per year.  
Vibratory liquid – approximately seven to ten 55 gallon drums per year.  
Hydraulic oil - approximately two to three 55 gallon drums per year.
- 2c. 1,1,1-Trichlorethane – Vapor Degreaser.  
Vibratory Solids – Finishing department Vibratory machines.  
Lacquer thinner and lacquer – Excess from spray department.  
Vibratory liquid – Finishing department Vibratory machines.  
Hydraulic oil – General plant maintenance.
- 2d. All waste disposal done in approved DOT 55 gallon drums.
- 2e. All waste has been removed by Philip Services, Waste Conversion or Stoudt Environmental.
3. Adam Stefanowicz  
 James Seeley (no current address or phone number)
4. Waste at Merit Metal was prepared for shipment and disposed of by the companies listed in 2e.
5. Waste was accumulated at Merit and then disposed of after a quote was given from the hauler. (see attached documents)
6. No
7. N/A
8. N/A
9. N/A
10. N/A

**Response of Respondent Merit Metal Products Corporation to EPA Required  
Submission of Information Chem Fab Corporation Site, Doylestown, Bucks County,  
Pennsylvania**

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11. N/A

12. N/A

13. N/A

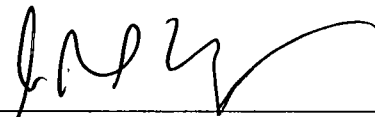
14. N/A

15. N/A

16. N/A

17. N/A

12/26/07  
Date

  
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Adam Stefanowicz  
Executive Vice President  
Merit Metal Products Corp.